

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Reading Division

IN RE: LUIS MIGUEL RIVERA	Case No. 25-10875-pmm Chapter 13
Freedom Mortgage Corporation, Movant	
vs. LUIS MIGUEL RIVERA , Debtor	

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Freedom Mortgage Corporation ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 3), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on March 4, 2025.
2. Movant holds a security interest in the Debtor's real property located at 1925 Reading Avenue, Reading, PA 19609 (the "Property"), by virtue of a Mortgage.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on March 4, 2025 (Doc 3).
4. The Plan includes payments toward the Note and Mortgage with Movant, however the figures used by the Debtor are inaccurate. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is \$97,376.31, whereas the Plan proposes to pay only \$96,068.76.
5. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§

1322(b)(3) and 1325(a)(5) and cannot be confirmed.

6. Movant objects to any plan which proposes to pay it anything less than \$97,376.31 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

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CERTIFICATE OF SERVICE

I, the undersigned, certify that on March 20, 2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

I certify under penalty of perjury that the above document was sent using the mode of service indicated.

Date: March 20, 2025

/s/Andrew Spivack

Andrew Spivack, PA Bar No. 84439
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Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

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